

RECEIVED
FEB 11 2008
FEDERAL COURT, SC

Plaintiffs

Arthur Hale and Patricia Hale

2008 FEB 11 A 9: 01

VS

Defendants

Edward Saleeby Jr.
James Cox Jr.
Kernard E. Redmond

**** Federal Court Complaint and Facts
Related to the 4:03-3625-27 case****

1. Defendants Obstructed Justice when these Defendants failed and neglected to follow the Federal Court Judge Harwell Order to file the Plaintiffs case in South Carolina State Court within the 30 day period in which he ordered the Defendants to do it . It's a fact because when this case was decided in Federal Court at this time in February 8, 2005 the Plaintiffs was being legally represented by these Defendants lawyers and law firm so it was their legal job, responsibility and duty to do it for their clients the Plaintiffs.
2. Defendants Neglected to tell the Plaintiffs in legal letter head from the Law Firm in writing on time within the 30 days that the Federal Court had already handed down their decision at all.
3. Defendants intentionally and/or knowingly with full legal knowledge know that they files the wrong charges and/or in the wrong court for the Plaintiffs because the Plaintiffs had discussed these issues with the defendants mention above ahead of time about what charges that the Defendants mention above would be filed against these Defendants in the first case was Contractor Fraud, Contractor Scam, Perjury lying to the Plaintiffs, SC Code Enforcer state employees that work for the Williamsburg County Code Enforcers Office workers had to conspired with the two Unlicensed Contractor/Electrician by giving a Building Permit and signing it off Mrs. Sheila James and Mr. Brown without asking and checking for SC Contractor License number on Jan 15, 2001. Without the other Defendants the other two Unlicensed Defendants Mr. Edwards and Mr. Hampton would not of gotten not one Building Permit Inspection Passed and Approved Jan 26, 2001 for the Santee Electric Company tell them that it was deemed safe an secure and thoroughly inspected completely by him County Code Enforcer Mr. Brown to turn the Plaintiff Electricity back on in Jan 29, 2001 without their assistance.
4. Defendants Obstructed Justice and Negligence to file the correct charges against any of the Defendants in the first case in the right Court in South Carolina after given the chance by Judge Harwell in the case that the Judge decided on in 02/8/04.
5. Defendants failed and negligent intentional and knowingly in which the above Defendants mention above know that it was the legal responsibility and job to notify the Plaintiff in legal letter head writing of any Motion Hearing on what day and time that is was going to occur but these Defendants didn't do it.
6. Defendants failed to give the Plaintiffs a legal written copy of the Summary Judgment decision paper at all from Federal Court by certified mail.
7. Defendants Obstructed Justice in the Plaintiffs case against the Defendants in the Summary Judgment in which Negligence occurred when the Defendants mention above didn't turn over any of the Plaintiffs evidence to the Defendants lawyers in the first

Summary Judgment case for 3 ½ years in which allowed the Statue of Limitation and Time to Run out in order to sue any of the Defendants in the first case.

8. Defendants above Notified the Defendants in the first case way ahead of time about the Plaintiffs suing them and the Defendants mention above notified the Defendants in the first case in writing about the evidence that the Plaintiffs gave them in Dec 2001 in their office on Irby Street.
9. Defendants mention above never turned over none of the evidence that the Plaintiffs gave to them against those Defendants in order to prove the Plaintiff case in Court to the Defendants in the first case that's in the Summary Judgment at all before 08/19/2004 for the Plaintiffs before the Statue of Limitation and Time Run out in the Plaintiffs case in order to prove their case in time against those Defendants in the first case. The Defendants lawyers in the first case argument and won on that fact Mr. Bill Door. Mr. Redmond told the Court one reason why didn't produce any evidence before. Then Mr. Redmond on 08/19/2004 while in Federal Court handed the Defendants two lawyers in the first case that was in the Court including the Judge Harwell a piece of paper that he filed in Court files stating that he was going to bring all of the Plaintiff evidence when he come to court with the Plaintiffs case to Court not before.
10. Defendant committed Perjury and obstructed justice in court when Mr. Redmond gave the other two defendants Co workers and his Boss a completely different reason in Writing in April 15, 2005 letter stating why he didn't do the Plaintiffs case in a correct or timely manner from Dec 2001 to April 2005 in any Court.
11. Defendants worked at the law firm at this time for years at this law firm he filed a Complaint in Federal Court too late against all of these Defendants in the Hale's case on November 18, 2003 to late and he never gave the Hale's a copy of the papers that he files into court for the Hale's at no time.
12. The Defendants mention above intentional and knowingly know that it was to late when the Defendants filed these papers in Federal Court on these Defendants in the first case but they didn't notify the Plaintiffs. It's a fact because the Defendants lawyers Mr. Bill Door from McNair law firm in Georgetown SC already argued in court and won on that issue in Federal Court on August 19, 2004 none of these lawyers put up or made argument against him. Defendants never notified the Hale's of the Motion Hearing that occur on 8/19/04 into legal letterhead writing paper or any paper of the Motion Hearing Date or Time. Hale called the Federal Court themselves and found out for the clerk Anna Miles when the Motion Hearing was being held the Hale's own lawyer and law firm Saleeby and Cox law firm withheld plenty of important information from their clients the Hale's for 3 years.
13. Defendants has mishandled and misrepresented the Plaintiffs case Dec 2001 to April 2005 legally against the Defendants in the Summary Judgment in the first case intentional and knowingly on their own free will. The Defendants lawyers in the first case argument and won on that fact.
14. Defendants mention above caused a Breach of Legal Contract to occur when it wasn't followed but contract was broken between the Defendants mention above with the Plaintiffs in the first case against the Defendants from Dec 2001 to April 2005.
15. Defendants mention above caused a Breach of Trust to occur when the Defendants mention above committed perjury lied several times at office visit appointments to the Plaintiffs about how they was legally handling and processing the Plaintiffs case in the first case against the Defendants in the first case from Dec 2001 to April 2005. The Plaintiffs found out for the first time on 08/19/2004 from the Defendants lawyers in the first case Mr. Door that none of the Defendants mention above didn't do nothing legally to advance the Plaintiffs case to purse, defend or prove it for 3 ½ years since these lawyers and law firm had the Plaintiffs case.

16. Defendant intentional and knowingly committed Perjury and Obstructed justice, gave the Plaintiffs False and Misleading Information face to face or on phone, nothing never in writing on what and how they the Defendants mention above was handling the Plaintiffs case that was being processed and handed by them the Defendants mention above for 3 ½ years against the Defendants in the First case.
17. Defendants since April 2005 have mislead the Hale's on the Legal Malpractice issue on how do the Defendants suppose to pay or compensate a former client of the Defendants mention above due to their legal mistake.
18. Plaintiffs found out by their Legal Malpractice lawyer that the Defendants had provided to the Plaintiffs a year later in April 2006 wasted False and Misleading Insurance Information about their Law Firm in which the Defendants above know ahead of time was not effective and it wouldn't cover the Plaintiffs case.
19. Plaintiffs wrote two letter one in April 2005 and September 2007 to resolve this Legal Malpractice Matter with the Defendants mentioned above they have not attempted in writing or by phone the Defendants didn't try to compensate or pay off the Plaintiffs their former client for the Legal Malpractice that their lawyers and law firm by not doing nothing or doing no legal actions in time neither caused Negligence and Statue of Limitation and Time to Run Out in the Plaintiffs case against the Defendants in the first case.
20. Plaintiffs and their case still is being Negligence or looked over intentional and known lying by the Defendants mention above by them never not trying to contact the Plaintiffs before the Statue of Limitation Time Run out on the Legal Malpractice ed by the Defendants but Ignored by the Defendant that mention above and have gotten no response from neither one of the owners or of the Law firm since the face to face office meeting in April 2005 have been told by the legal secretary in the Defendants office mention above for Mrs. Hale not to never call the Law Firm a Public Office in which the Plaintiffs have a unresolved Legal Issues with Defendant in that office now a Legal Malpractice no money wasn't never paid to the Plaintiffs for these Defendants Legal Mistake yet its November 2007 for neither one of the cases. First case that they destroyed in your court or second case Legal Malpractice.
21. Defendants was given additional proof to the Defendants Law Firm owners by the Plaintiffs that proved that the Plaintiffs had a case in the beginning against the Defendants in the first case a lot of papers in April 2005 to Oct 2006.

FACTS RELATED TO THE 4; 03-3625-27 CASE

THE HALE IS REPORTING THE UNLAWFUL, DECEPTIVE, INTENTIONAL,LEGAL WRONG DOING MR. REDMOND AND THE Mr. Saleeby and Mr. Cox have only done things to cover up their actions that was not done properly in this case to the Hale. None of these lawyers have done anything to admit to their wrong doing and legal mistakes that they cause to occur in the Hale's case but they only have tried to cover up the facts on what happen to the Hales case to other people up to right now.

THE HALE'S WILL HAVE TO SUE THE LAWYERS & LAW FIRM OWNERS Mr. REDMOND, Mr. Ed Saleeby & James Cox FOR LEGAL MALPRACTICE IF THEY DO NOT SETTLE OUT OF COURT WITH THE HALE'S. BECAUSE HALE'S CAN & WILL PROVE TO THE COURT THAT YOUR office HAD THE WITH THE LEGAL EVIDENCES FROM FEDERAL COURT RECORDS AND OTHER PAPERSWORK FROM OTHERS IN THE RECORD THAT THE HALE HAVE NOW 2007. THESE ARE THE SAME RECORDS THAT THE HALE'S GAVE TO THE Lawyer & LAW FIRM 31/2 years ago IN WHICH THEY DIDN'T DO ANYTHING WITH Dec2001 to April 2005 to defend, Prosecute, prove the Hale's case against none of the Defendants at all in anyway.

These are the charges that the Hale's can & will file, and prove against Mr. Kernard E. Redmond and Saleeby & Cox law firm owners listed below that did occur in the Hale's case and can be proven with the Federal Court Records and Hale's picture, paperwork, and sawed off piece from the original case. Mr. and Mrs. Hale will & can prove that THESE LAWYERS REDMOND, SALEEBY, COX NEGLECTED TO DEFEND, PROVE, GET COMPENSATION FOR THE HALE'S IN THEIR CASE AGAINST NONE OF THESE DEFENDANTS.

1. Breach of Contract-these lawyers and law firm didn't honor, respect, legally followed, for fill the written contract with the Hale's their clients instead they have breached the contract with their contract with their clients by violated their clients Legal Rights and didn't provide the Hale's with proper Legal Service on time.
2. Breach of Trust-these lawyers an law firm can not be trusted, depended upon, trustworthy of in doing a case when they discusses a clients case with the Hale's but then lawyers made a legal decisions behind the Hale's back without their knowledge in which legally affected the decision and outcome of the Hale's case in Court.
3. Fraud- these lawyers at this law firm intentionally , unknowingly faxed in a letter to their Law Firm Insurance Company in which they know ahead of time didn't give the correct reason or information in it giving the legal court reason why the Hale's lost their case in Federal Court against the Defendants. These lawyers at this law firm also faxed information to their Law firm Insurance Company in which they don't have no concrete, solid, clear, vivid, proof written that Prejudice would of occurred if they would of and should of fully and legally handled, represented the Hale's case in the proper manner in a ethical time frame but they

didn't right by crossing up the Insurance Company in order to buy time and so that why they gave them the wrong information and reason too. They committed fraud by using deceptive legal tactics and practice over on the Hale's and the Law Firm Insurance Company intentionally & knowingly.

4. Perjury- these lawyers and law firm has committed perjury since Dec 2001 to now they lied to the Hale's and to the Hale's Legal Malpractice Lawyer in which they Hale's hired Mr. John Roxon, Charleston, SC telling them their own reason why they didn't win the Hale's case but they intentionally & knowingly left out the correct and legal reason in which the Federal Court papers clearly, vividly, gave to these lawyers and law firm. These lawyers and law firm made a legal reason up in April 2005 in which was the first time Hale's was ever advise by these lawyers of Rejudaca it wasn't never mention before the date previously mentioned. They lied when they tried to say that Magistrate Court had something to do with Federal Court but in reality it didn't because the Hale's sent for and got the tape and paper proof that's not true. They committed perjury by using deceptive legal tactics and practice to get over on the Hale's and their INS Co.
5. Conspired-these lawyers and law firm unlawfully, unfairly, unethical, unprofessional, deceitfully, conspired against the Hale's their clients under the cover behind our back legally without our knowledge Through the way in which how they handle & represented the Hale's in this case. They sent a conflicted message legally when they talked or Hale's visit the law firm and lawyers in their office the acted, behaved in a manner like they were working on the Hale's case vigorously by showing us papers in which Mr. Redmond and Saleeby & Cox law firm filed in Federal Court and signed stating that they were going to take the Hale's case to Trial in Federal Court in November 18, 2003. In 2004 when the law firm stuffed the Hale's file in a warehouse and they allowed Mr. Redmond to carry around the Hale's file and remove it from out their office without their knowledge. Then Mr. Redmond lost the Hale's whole file in which the Hale's had Mr. Redmond to sign a paper and pay \$60 to get Duplicated Copies from Hale in June or July 2004 before court. They conspired together Mr. Redmond and the Mr. Ed Saleeby and Mr. James Cox when they acted, behaved like they didn't so anything wrong legally in the Hale's case in no way plus they acting like they can't and don't realize or recognize what their law firm or lawyers did wrong in the Hale's case in which they handled for 31/2 in courts. Even now the law firm owners have no responded to the Hale's two types letter in which were they asked for a settlement to resolve the Hale's case in April and May 2005 but the Hale's did provide and give them addition information that they asked for on the Hale's case to prove it.
6. First, because these lawyers & law firm violated and didn't protect the Legal Rights or Follow the Legal Laws in processing the Hale's case against these defendants in time. They have MISREPRESENTED, MISHANDLE, MISTREATED, MISLEAD THE HALE'S CASE DECEPTIVELY IN A UNFAIR, UNETHICAL, UNPROFESSIONAL MANNER. Mr. and Mrs. Hale will & can prove that THESE LAWYERS REDMOND, SALEEBY, and COX NEGLECTED PROVE THE HALE'S CASE LEGALLY IN A COURT OR TO THE DEFENDANTS LAWYERS IN ANYWAY OUT OF 31/2 YEARS. IT'S A

FACT DUE TO THESE LAWYERS NEGLECT TO FULLY PROVE THE HALE'S CASE BEYOND A REASONABLE DOUBT TO THE COURT THAT'S WHY THESE THING HAVE OCCURRED LEGALLY IN THE HALE'S CASE: THE COURT RECORD CAN PROVE THIS LEGALLY, ALONG WITH THE REASON WHY/HOW THE DEFENDANTS WON THEIR CASE AGAINST THE HALE'S THE PLAINTIFFS:

1. STATUTE OF LIMITATION TO FILE THE CASE IN COURT AGAINST ALL FOUR OF THESE DEFENDANTS
2. TIME RUN OUT IN FIGHTING THE CASE IN COURT & FIGHTING THE CASE IN COURT AGAINST ALL FOUR OF THESE DEFENDANTS

Second, these are the Legal service that they didn't provide, legal responsibilities and duties that Mr. Redmond and Saleeby & Cox law firm Neglected to for fill correctly & completely in the Hale's case For the Hale's.

This how/why Legal Malpractice has occurred in the Hale's case here. How / why Neglect occurred here too in the Hale's case Dec 2001 to April 2005 even now no clear, vivid, concrete reason was given with proof to prove why this happen to the Hale's. Mr. Redmond and Saleeby & Cox law Firm unlawful, deceitfully, unfairly, unethically, unprofessional kept these deceitful, intention, bad behaviors, actions under the cover hidden well from the Hale's without the knowledge of the Hale's and Defendants didn't or it wasn't communicated to/with the Hale's in no way of the decisions that was made into their case by these lawyers and law firm.

1. They neglect to tell the Hale's that they didn't give the Defendants or their lawyers none of the evidence that the Hale's gave to them Dec 2001 at all at no time.
2. They neglect to tell the Hale's that their law firm or lawyer wasn't defending, fighting, or trying to prove the Hale's case to get compensate for 31/2 years until April 2005. After the Hale' found out from the Court not no one from your
3. They neglected to tell Hale's when they found out from the Federal Court of the court date on Aug 19, 2004 written or orally no phone or written record of it.
4. They neglected to tell Hale's of the about the Federal court Judge Harwell decision that he orally or written in which the Judge mailed their law firm & lawyer a copy of it in February 8, 2005 but the Hale's had to go to the court house on 5th floor to pick their own one in April 2005. The law firm or lawyer that was representing the Hale's didn't tell the Hale' about these papers neither in no way.
5. They neglect to get any compensation for the severe damages that was left on the Hale's home from not even one or none of the defendants out of 31/2 years plus now the law firm does not want to compensate the Hale's for their mistake in which they made in the Hale's case.

Mr. and Mrs. Hale is reporting to your office of the Unlawful, Deceitful , Un fair, Unethical, Un professional Legal Scam and Scandal that happen to the Hale's in their case between the Hale's and their own lawyer Mr. Kennard E. Redmond & Saleeby & Cox law firm, Hartsville, SC 311 West Home Street. The Hale is also reporting how they took Legal Advantage and Legal Rights of the Hale's that's their own clients in

which these lazy actions, behaviors of lawyer & law firm caused the Hales to lose their case.

Mr. Redmond And no one from Saleeby & Cox law firm from Dec 2001 until Aug 19, 2004 from every office visit , telephone conversation over these years before the hale went to court with the defendants hale's was present in court on the court date. They never once communicated to the Hale's that they wasn't going to work on the Hale's case due to Rejudaca will occur in the case any defendants ad no one from Saleeby & Cox law firm legally advise the Hale or cooperating with the Hale in order to resolve this serious Legal Matter that is not resolve yet it's 2007 in no way. These lawyers and law firm miscalculated and misinterpreted the Law in the Hale's case in which they should know that Rejudaca didn't and don't in any way refer to or couldn't occur in the Hale's case against any of the defendants.

Mr. and Mrs. Hale was Scam by the defendants in this case plus their own law Firm and lawyer that they hired to represent and handle their case has conspired against them, committed perjury, est. Mr. and Mrs. Hale' haven't receive no compensation for their great lost of husband worker compensation, damage to home whole electrical inside/outside, lost of home no insurance company would insure it without the electricity working it was still a major problem that Hale's left on the home we could afford to keep repairing this problem which started in Aug 2001 for first time at 3593 Oakridge Road, Andrews, SC 29510 in Williamsburg County.

Finally Mr. and Mrs. Hale have tried to Compromise and Negotiate Settlement Agreement the Saleeby and Cox law firm and law firm owners and their insurance company since April 2005 to Feb 2008 through sending 4 Certified Letters directly to their off but no response came back to Hale's at their Florence address just for the Dec 18, 2007 letter. The other three previous letters that was sent to law firm office on May 9, 2005, Oct 10, 2005, and September 11, 2007 was ignored just like several of Mrs. Hale calls to set up appointment to meet with the owners after the Hale's found out in Sept 2006 from their Legal Malpractice lawyer and the Law Firm Insurance Company Rep Ernest that the two law firm owners knew ahead of time that they didn't have No Insurance Coverage through the company that to cover the Hale's case. The Insurance Company Rep Ernest said that the law firm lawyers and owners know that they handles and settle with their own former clients like the Hale's in their Legal Malpractice case for with their law firm directly compensate and pays for any damages and recover any funds that are lost in their clients the Hale's case but the Law firm owners Mr. Saleeby and Mr. Cox have not made no effort to compromise or settle in no way with the Hale's or pay the Hales back for the damages and things that the Hale's lost related to in the Hale's case. These lawyers and law firm owners have shown no respect, no honor, no loyalty, or no remorse for the Poor Legal Services that they have provided to the Hale's into their case that is what cause the Hale's to lose their case anyway.